

UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF ILLINOIS, EASTERN DIVISION

FILED

In the Matter of the Search of:

Case Number:

JAN 17 2018

the US Priority Mail Express package bearing
tracking number EM017844575US, further described
in Attachment A

18M31

MICHAEL T. MASON
MAGISTRATE JUDGE
UNITED STATES DISTRICT COURT

APPLICATION AND AFFIDAVIT FOR A SEARCH WARRANT

I, Thomas Lynch, a Postal Inspector of the U.S. Postal Inspection Service, request a search warrant and state under penalty of perjury that I have reason to believe that in the following package:

See Attachment A

located in the Northern District of Illinois, there is now concealed:

See Attachment B

The basis for the search under Fed. R. Crim. P. 41(c) is evidence, instrumentalities, and contraband.

The search is related to a violation of:

Code Section

Title 21, United States Code, Section 843(b)

Offense Description

Use of a communications facility to commit a narcotics felony

The application is based on these facts:

See Attached Affidavit,

Continued on the attached sheet.



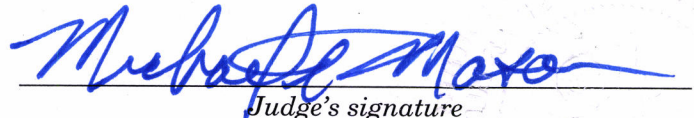
Applicant's Signature

THOMAS LYNCH, Postal Inspector, U.S. Postal Inspection
Service

Printed name and title

Sworn to before me and signed in my presence.

Date: January 17, 2018



Judge's signature

City and State: Chicago, Illinois

MICHAEL T. MASON, U.S. Magistrate Judge

Printed name and title

instrumentalities, and contraband of violations of Title 21, United States Code, Section 843(b), are located within the **Subject Parcel**.

I. FACTS SUPPORTING PROBABLE CAUSE TO SEARCH THE SUBJECT PARCEL

5. On January 16, 2018, I inspected the **Subject Parcel** at the Frankfort Post Office, in Frankfort, Illinois. The **Subject Parcel** was mailed on January 12, 2018, from Santa Ana, 92799 and is addressed to "Virginia V. Jones, 9512 Birch Ave., Mokena, IL 60448," with a return address of "Oscar Hunt, 919 Dennis St., Santa Ana, CA 92704." The **Subject Parcel** bears \$110.95 in postage, measures approximately 17 inches by 17 inches by 16 inches, and weighs approximately 15 lbs., 14 oz.

6. I observed several characteristics about the **Subject Parcel** that, in my training and experience, can be consistent with parcels containing a controlled substance.

7. First, I ran the sender and recipient names and addresses on the **Subject Parcel** through a law enforcement database. According to this search, neither the sender nor recipient names correlate with names for the listed addresses. Based on my training and experience, fictitious sender or receiver names, and fictitious return addresses, can indicate that the sender or receiver does not want to be associated with the parcel.

8. In addition, the **Subject Parcel** is taped with tape on all of the parcel seams. Based on my training and experience, parcels can be taped in this manner in an attempt to hide or mask the odor of the parcel's contents.

9. Each of the characteristics I describe above can be consistent with parcels that do not contain contraband. Based on my training and experience, however, the combination of these characteristics led me to investigate further by calling in a narcotics dog to perform further examination of the **Subject Parcel**.

10. On January 16, 2018, I arranged for a United States Customs and Border Protection Canine Officer and his canine partner, "Perro," to meet with me and examine the **Subject Parcel**. According to the Canine Officer, Perro is certified annually by United States Customs and Border Protection as a narcotics dog. Perro was most recently re-certified on February 6, 2017. Perro is trained to sniff buildings, vehicles, envelopes, and wrapped parcels to detect the odors of heroin, cocaine, marijuana, hash, methamphetamine, ecstasy, and other controlled substances that could be contained inside. Perro is also trained to indicate the presence of such substances or their scents by alerting to the item he is sniffing. In addition, according to USPIS records, Perro has successfully alerted to controlled substances in U.S. Mail Parcels and letters on 172 occasions since July 2013, with a success rate of approximately 91%. To the best of my knowledge, U.S. Customs and Border Protection does not maintain records regarding the overall success rate for its drug detection dogs, and therefore only the USPIS success rate is available.

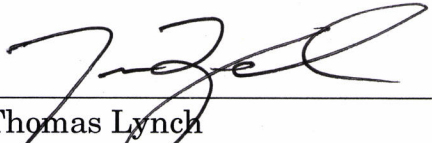
11. On January 16, 2018, at the Postal Service International Service Center at O'Hare Airport in Chicago, Illinois, I arranged a controlled substance detection test by placing the **Subject Parcel** among approximately 20 other parcels in the

workroom area. I then witnessed Perro examine the parcels and observed Perro alert by sitting next to the **Subject Parcel**. Perro did not alert to any of the other parcels. The Canine Officer informed me that Perro's actions indicated the presence of narcotics and/or controlled substances in the **Subject Parcel**. I then took custody of the **Subject Parcel**.

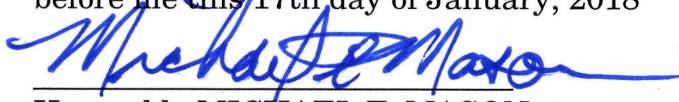
II. CONCLUSION

12. Based on the above information, I respectfully submit that there is probable cause to believe that narcotics offenses, in violation of Title 21, United States Code, Section 843(b), have been committed, and that evidence, instrumentalities, and contraband relating to this criminal conduct, as further described in Attachment B, will be found in the Subject Parcel, as further described in Attachment A. I therefore respectfully request that this Court issue a search warrant for the **Subject Parcel** more particularly described in Attachment A, authorizing the seizure of the items described in Attachment B.

FURTHER AFFIANT SAYETH NOT.


Thomas Lynch
Postal Inspector
U.S. Postal Inspection Service

Subscribed and sworn
before me this 17th day of January, 2018


Honorable MICHAEL T. MASON
United States Magistrate Judge

ATTACHMENT A

DESCRIPTION OF ITEM TO BE SEARCHED

The US Priority Mail Express Parcel with Tracking Number EM017844575US, bearing a return address of "Oscar Hunt, 919 Dennis St., Santa Ana, CA 92704," and a recipient address of "Virginia V. Jones, 9512 Birch Ave., Mokena, IL 60448." The **Subject Parcel** weighs approximately 15 lbs., 14 oz., is approximately 17 inches by 17 inches by 16 inches in size, and bears \$110.95 in postage.

ATTACHMENT B

LIST OF ITEMS TO BE SEIZED

Evidence, instrumentalities and contraband concerning violation of Title 21,
United States Code, Section 843(b), as follows:

1. Controlled substances.
2. Items that identify the sender or receiver of the parcel.

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SEARCH AND SEIZURE WARRANT

To: Thomas Lynch and any authorized law enforcement officer

An application by a federal law enforcement officer or an attorney for the government requests the search of the following person or property located in the Northern District of Illinois:

See Attachment A

I find that the affidavit(s), or any recorded testimony, establish probable cause to search and seize the person or property described above, and that such search will reveal:

See Attachment B

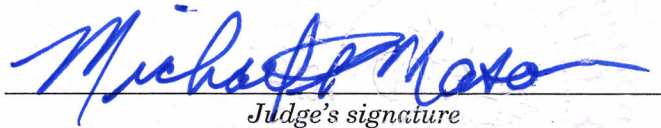
YOU ARE HEREBY COMMANDED to execute this warrant on or before January 31, 2018 in the daytime (6:00 a.m. to 10:00 p.m.).

Unless delayed notice is authorized below, you must give a copy of the warrant and a receipt for the property taken to the person from whom, or from whose premises, the property was taken, or leave the copy and receipt at the place where the property was taken.

The officer executing this warrant, or an officer present during the execution of the warrant, must prepare an inventory as required by law and promptly return this warrant and inventory to the issuing United States Magistrate Judge.

9:15 AM

Date and time issued: January 17, 2018


Judge's signature

City and State: Chicago, Illinois

MICHAEL T. MASON, U.S. Magistrate Judge
Printed name and title

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